# Application for Construction Permit for Reserved Channel Noncommercial Educational Broadcast Station

**Section I - General Information**

1. **Legal Name of the Licensee/Permittee**
   PASADENA AREA COMMUNITY COLLEGE DISTRICT
   
   **Mailing Address**
   1570 E. COLORADO BLVD.
   
   **City**
   PASADENA
   
   **State or Country (if foreign address)**
   CA
   
   **Zip Code**
   91106 - 2003
   
   **Telephone Number (include area code)**
   6265857201
   
   **E-Mail Address (if available)**
   PPERFUMO@PACCD.CC.CA.US
   
   **FCC Registration Number:**
   0005085204
   
   **Call Sign**
   KPCC
   
   **Facility Identifier**
   51701

2. **Contact Representative (if other than licensee/Permittee)**
   JOHN CRIGLER
   
   **Firm or Company Name**
   GARVEY SCHUBERT & BARER
   
   **Telephone Number (include area code)**
   2029657880
   
   **E-Mail Address (if available)**
   JCRIGLER@GBSLAW.COM

3. **Is this application being filed in response to a window?**
   If Yes, specify closing date and/or window number:
   ☐ Yes ☐ No

4. **Application Purpose**
   - ☐ New station
   - ☐ Major Modification of construction permit
   - ☐ Minor Modification of construction permit
   - ☐ Major Change in licensed facility
   - ☐ Minor Change in licensed facility
   - ☐ Major Amendment to pending application
   - ☐ Minor Amendment to pending application
   - ☐ (a) File number of original construction permit:
     -
   - ☐ (b) Service Type:
     ☐ FM ☐ TV ☐ DTV
   - ☐ (c) Community of License:
     City: PASADENA State: CA
   - ☐ (d) Facility Type
     ☐ Main ☐ Auxiliary

If an amendment, **submit as an Exhibit** a listing by Section and Question Number the portions of the pending application that are being revised.

**NOTE:** The failure to include an explanatory providing full particulars in connection with a "No" response may result in dismissal of the application. See Instructions, paragraph I for additional information regarding completion of explanatory exhibits.

**SECTION II - Legal and Financial**

1. **Certification.** Applicant certifies that it has answered each question in this application based on ☐ Yes ☐ No
its review of the application instructions and worksheets. Applicant further certifies that where it
has made an affirmative certification below, this certification constitutes its representation that
the application satisfies each of the pertinent standards and criteria set forth in the application
instructions and worksheets.

2. **Eligibility.** Each application must answer "Yes" to one and "No" to two of the three following
certifications. An applicant should not submit an explanatory exhibit in connection with these
Question 2 "No" responses.

The applicant certifies that it is:

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<th>a nonprofit educational institution; or</th>
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<td>a governmental entity other than a school; or</td>
<td>☐ Yes ☐ No</td>
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<td>a nonprofit educational organization, other than described in a. or b.</td>
<td>☐ Yes ☐ No</td>
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3. For applicants checking "Yes" to question 2(c) and applying for a new noncommercial educational
television station only, the applicant certifies that the applicant's officers, directors and members of
its governing board are broadly representative of the educational, cultural, and civic segments of the
principal community to be served.

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4. a. The applicant certifies that the Commission has previously granted a broadcast application identified
here by file number that found this applicant qualified as a noncommercial educational entity with a
qualifying educational program, and that the applicant will use the proposed station to advance
a program similar to that the Commission has found qualifying in applicant's previous application.

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<tr>
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<td>FCC FileNumber _</td>
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<td>[Exhibit 2]</td>
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b. Applicants who answered "No" to Question 4(a), must include an exhibit that describes the applicant's
educational objective and how the proposed station will be used to advance an educational program
that will further that objective according to 47 C.F.R. Section 73.503 (for radio applicants) and 47
C.F.R. Section 73.621 (for television applicants).

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5. The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter,
enabling statute, and/or other pertinent organizational document) permit the applicant to advance an
educational program and that there is no provision in any of those documents that would restrict the
applicant from advancing an educational program or complying with any Commission rule, policy, or
provision of the Communications Act of 1934, as amended.

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6. a. **Parties to the Application.** List separately each party to the application including, as applicable, the
applicant, its officers, directors, five percent or greater stockholders, non-insulated partners, members,
and all other persons and entities with attributable interests. If another entity hold an attributable
interest in the applicant, list separately, as applicable, its officers, directors, five percent or greater
stockholders, non-insulated partners, and board members. Create a separate row for each individual or
entity. Attach additional pages if necessary.

[Enter Parties/Owners Information]

b. Applicant certifies that equity and financial interests not set forth above are non-attributable pursuant
to 47 C.F.R. Section 73.3555 and that there are no agreements or understandings with any non-party
that would give influence over the applicant's programming, personnel, or finances to that non-party.

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<td>[Exhibit 3]</td>
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7. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in
which applicant or any party to the application has an attributable interest pursuant to the notes to 47
C.F.R. Section 73.3555.

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8. **Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has
had any interest in or connection with:

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<td>See Explanation in [Exhibit 5]</td>
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a. any broadcast application in any proceeding where character issues were left unresolved or were
resolved adversely against the applicant or party to the application; or

b. any pending broadcast application in which character issues have been raised.

9. **Adverse Findings.** Applicant certifies that, with respect to the applicant, any party to the application,
and any non-party equity owner in the applicant, no adverse finding has been made, nor has an adverse
final action been taken by any court or administrative body in a civil or criminal proceeding brought
under the provisions of any law related to any of the following: any felony; mass media-related antitrust
or unfair competition; fraudulent statements to another government unit; or discrimination.

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<td>See Explanation in [Exhibit 6]</td>
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If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved,
including an identification of the the court or administrative body and the proceeding (by dates and file
10. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

   ☐ Yes ☐ No

   See Explanation in [Exhibit 7]

11. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

   ☐ Yes ☐ No

12. **Local Public Notice.** Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.

   ☐ Yes ☐ No

13. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

   ☐ Yes ☐ No

14. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

   ☐ Yes ☐ No

   ☐ N/A

**QUESTIONS 15, 16 AND 17 APPLY ONLY TO APPLICANTS FOR NEW STATIONS. OTHER APPLICANTS CAN PROCEED TO QUESTION 18.**

15. **Financial.** The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.

   If "No" to 15., answer question 16. and 17.

   ☐ Yes ☐ No

   See Explanation in [Exhibit 8]

16. **Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration?**

   ☐ Yes ☐ No

17. **Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision?**

   ☐ Yes ☐ No

NOTE: If Yes to 16. or 17., the application cannot be granted unconditionally until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on the applicant's part is required. If the applicant relies on funds from a source specified in Question 17., the applicant must advise the Commission when the funds are committed or appropriated. This should be accomplished by letter amendment to the application. Applicants should take note that the Commission's construction period is not considered "toggled" by funding difficulties and that any permit granted conditionally on funding will expire if the station is not constructed for any reason, including lack of funding.

**QUESTIONS 18 AND 19 DO NOT APPLY TO APPLICATIONS FOR NEW STATIONS. APPLICANTS FOR NEW FM STATIONS CAN PROCEED TO SECTION III. APPLICANTS FOR NEW TV STATIONS CAN PROCEED TO SECTION IV.**

**Holding Period.**

18. Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b).

   If "No," answer a. and b. below. If applicant answers "No" to 18. above and cannot answer "Yes" to either a. or b. below, the application is unacceptable.

   a. Applicant certifies that the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.

   ☐ Yes ☐ No

   b. Applicant certifies that although it proposes to downgrade service to the area on which the Section 307(b) preference was based, applicant has provided full service to that area for a period of four years of on-air operations.

   ☐ Yes ☐ No

19. Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003.

   If "No," applicant must be able to answer "Yes" to a. below or provide an exhibit that makes a...
compelling showing that the downgrade would be in the public interest.

a. Applicant certifies that the population and area within the proposed service contour (60 dBu (FM) or grade B (TV)) are greater than or equivalent to those authorized.  

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Section III

Fair Distribution of Service Pursuant to 47 U.S.C. Section 307(b) (New and Major Changes to FM Radio Only) (Other applicants can proceed to Section IV).

1. Applicant certifies that the proposed station will provide a first noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour and (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.  

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2. Applicant certifies that the proposed station will provide a second noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour and (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.  

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Section IV Point System Factors - New and Major Change Applications Only (used to select among mutually exclusive radio and television applications for new stations and major modifications) NOTE: Applicants will not receive any additional points for amendments made after the close of the application filing window.

1. **Established Local Applicant:** Applicant certifies that for at least the 24 months immediately prior to application, and continuing through the present, it qualifies as a local applicant pursuant to 47 C.F.R. Section 73.7000, that its governing documents require that such localism be maintained, and that it has placed documentation of its qualifications as an established local applicant in a local public inspection file and has submitted to the Commission copies of the documentation.  

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2. **Diversity of Ownership:** (a) Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized station (comparing radio and television to television, including non-fill-in translator stations other than those identified in 2(b) below) in which any party to the application has an attributable interest as defined in 47 C.F.R. Section 73.3555, that its governing documents require that such diversity be maintained, and that it has placed documentation of its diversity qualification in a local public inspection file and has submitted to the Commission copies of the documentation.

(b) Is the application's certification to 2(a) based on its exclusion of translator station(s) that will be replaced with a full service station pursuant to the authorization requested here?  

If Yes, applicant must include an exhibit identifying the translator station authorization for which it will request cancellation upon commencement of operation of the proposed full service station (i.e., upon its filing of a license application and receipt of program test authority).  

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3. **State-wide Network:** Applicant certifies that (a) it has NOT claimed a credit for diversity of ownership above; (b) it is one of the three specific types of organizations described in 47 C.F.R. Section 73.7003(b)(3); and (c) it has placed documentation of its qualifications in a local public inspection file and has submitted to the Commission copies of the documentation.  

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4. **Technical Parameters:** Applicant certifies that the numbers in the boxes below accurately reflect the new area and population that its proposal would serve with a 60 dBu (FM) or Grade B (TV) signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) (FM) and 73.683(TV) and that it has documented the basis for its calculations in the local public inspection file and has submitted copies to the Commission. Major modification applicants should include the area of proposed increase only (exclude any area already within the station's existing service area). (Points, if any, will be determined by FCC)

| New area served in square kilometers (excluding areas of water): |
| Population served based on the most recent census block data from the United States Bureau of Census using the centroid method: |

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SECTION V - Tie Breakers - New and Major Change Applications Only (used to choose among competing radio and television applications receiving the same number of points in Section IV)
1. **Existing Authorizations.** By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of relevant broadcast station authorizations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV (2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial and TV translator stations other than fill-in stations or those identified in IV(2)(b) above.

   (number of commercial and non-commercial licenses and construction permits)

2. **Pending Applications.** By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of pending applications for new or major changes to relevant broadcast stations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV(2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial, and TV translator stations other than fill-in stations or those identified in IV(2)(b) above.

   (number of pending commercial and non-commercial applications)

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**Section VI -- Certification**

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

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<th>Typed or Printed Name of Person Signing</th>
<th>Typed or Printed Title of Person Signing</th>
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<tr>
<td>DR. PAULETTE PERFUMO</td>
<td>PRESIDENT, PASADENA AREA COMMUNITY COLLEGE DISTRICT</td>
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Signature Date

9/6/2007

**Section VII Preparer's Certification**

I certify that I have prepared Section VII (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

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<tr>
<th>Name</th>
<th>Relationship to Applicant (e.g., Consulting Engineer)</th>
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<tbody>
<tr>
<td>FRED W. VOLKEN</td>
<td>ENGINEERING CONSULTANT</td>
</tr>
</tbody>
</table>

Signature Date

9/5/2007

**Mailing Address**

348 W. SIERRA MADRE BLVD.

City

SIERRA MADRE

State or Country (if foreign address)

CA

Zip Code

91024-

Telephone Number (include area code)

6263551171

E-Mail Address (if available)

FREDWVOLKEN@EARTHLINK.NET

**WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).**

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**Section VII - FM Engineering**

**TECHNICAL SPECIFICATIONS**

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1. Channel Number: 207

2. Class (select one):

   - [ ] D
   - [ ] A
   - [ ] B
   - [ ] C
   - [ ] B1
   - [ ] B
   - [ ] C3
   - [ ] C2
   - [ ] C1
   - [ ] C0
   - [ ] C
3. Antenna Location Coordinates: (NAD 27)
   Latitude: Degrees 34 Minutes 13 Seconds 36 ° North ° South
   Longitude: Degrees 118 Minutes 3 Seconds 58 ° West ° East

4. Proposed Assignment Coordinates: (NAD 27) - RESERVED CHANNELS ABOVE 220 ONLY ☑ Not Applicable
   Latitude: Degrees Minutes Seconds ° North ° South
   Longitude: Degrees Minutes Seconds ° West ° East

5. Antenna Structure Registration Number: 1013888
   ☑ Not Applicable ☐ Notification filed with FAA

6. Overall Tower Height Above Ground Level: 82 meters

7. Height of Radiation Center Above Mean Sea Level: 1783 meters(H) 1783 meters(V)

8. Height of Radiation Center Above Ground Level: 52 meters(H) 52 meters(V)

9. Height of Radiation Center Above Average Terrain: 891 meters(H) 891 meters(V)

10. Effective Radiated Power: .86 kW(H) .86 kW(V)

11. Maximum Effective Radiated Power: (Beam-Tilt Antenna ONLY) ☑ Not Applicable kW(H) kW(V)

12. Directional Antenna Relative Field Values: ☑ Not applicable (Nondirectional)
   Rotation (Degrees): ☑ No Rotation

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   Relative Field Polar Plot

   NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

   CERTIFICATION

   AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 12-15.

13. Main Studio Location. The proposed main studio location complies with 47 C.F.R. Section 73.1125. ☑ Yes ☐ No
   See Explanation in [Exhibit 13]

14. Community Coverage. The proposed facility complies with 47 C.F.R. Section 73.315. (Channels 221 and above) or 47 C.F.R. Section 73.515 (Channels 220 and below). ☑ Yes ☐ No
   See Explanation in [Exhibit 14]

15. Interference. The proposed facility complies with all of the following applicable rule sections. Check all that apply:
   ☑ Yes ☐ No
   See Explanation in [Exhibit 15]

   Contour Overlap Requirements.
   a. ☑ 47 C.F.R. Section 73.509
      Exhibit Required. [Exhibit 16]
Spacing Requirements.

b. 47 C.F.R. Section 73.207 with respect to station(s)

c. 47 C.F.R. Section 73.213(a) with respect to station(s)  
   Exhibit Required. [Exhibit 17]

d. 47 C.F.R. Section 73.215(a) with respect to station(s)  
   Exhibit Required. [Exhibit 18]

television Channel 6 Protection.

e. 47 C.F.R. Section 73.525 with respect to station(s)  
   Exhibit Required. [Exhibit 19]

16. Reserved Channels Above 220.
   a. Availability of Channels. The proposed facility complies with the assignment requirements of 47 C.F.R. Section 73.203.  
      C Yes  C No  
      See Explanation in [Exhibit 20]

17. International Borders. The proposed antenna location is not within 320 kilometers of the common border between the United States and Canada or Mexico.  
   If "No," specify the country and provide an exhibit of compliance with all provisions of the relevant International Agreement.  
      C Yes  C No  
      Canada  Mexico  
      [Exhibit 21]

18. Environmental Protection Act.  
   The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Worksheet #7, an Exhibit is required.  
   By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.  
   C Yes  C No  
   See Explanation in [Exhibit 22]

19. Community of License Change - Section 307(b).  
   If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change comports with the fair distribution of service policies underlying Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).  
   C Yes  C No  
   N/A  
   [Exhibit 23]

PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

Exhibits

Exhibit 15
Description: EXHIBIT 15

INTERFERENCE CONSIDERATIONS

As shown in Exhibit 16 of this application, and subject to Commission approval of the accompanying waiver request, the proposed operation of KPCC(FM) would conform with the requirements of Section 73.509 of the Commission's rules, and related established Commission policies, with respect to overlap of contours and predicted interference to the pertinent existing stations, construction permits and pending applications.

Additionally, as explained in Exhibit 19 of this application, the proposed operation of KPCC(FM) would conform with the requirements of Section 73.525 of the rules with respect to predicted interference to TV channel 6.
**Attachment 15**

**Exhibit 16**
**Description:** EXHIBIT 16

CONTOUR OVERLAP REQUIREMENTS

**THIS EXHIBIT CONSISTS OF TWO PARTS, AS FOLLOWS:**

**PART A: OVERLAP OF CONTOURS**
STATEMENT AND TABLE A
- FIGURE 1, CO-CHANNEL INTERFERENCE CONSIDERATIONS
- FIGURE 2A, FIRST ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS
- FIGURE 2B, FIRST ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS
- FIGURE 3, SECOND AND THIRD ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS
- FIGURE 4, THIRD ADJACENT CHANNEL INTERFERENCE CONSIDERATIONS
- FIGURE 5, PRESENT AND PROPOSED SERVICE CONTOURS

**PART B: REQUEST FOR WAIVER OF SECTION 73.509 OF COMMISSION'S RULES**

**Attachment 16**

<table>
<thead>
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<th>Description</th>
</tr>
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<tr>
<td>EXHIBIT 16, PART A, FIGURE 1</td>
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<td>EXHIBIT 16, PART A, FIGURE 2A</td>
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<td>EXHIBIT 16, PART A, FIGURE 2B</td>
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<td>EXHIBIT 16, PART A, FIGURE 3</td>
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<td>EXHIBIT 16, PART A, FIGURE 5</td>
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<tr>
<td>EXHIBIT 16, PART B</td>
</tr>
</tbody>
</table>

**Exhibit 19**
**Description:** EXHIBIT 19

TELEVISION CHANNEL 6 PROTECTION

**THERE ARE TWO AFFECTED CLASS A TV STATIONS ON CHANNEL 6, KSFV-LP, SAN FERNANDO VALLEY, CALIFORNIA, AND K06MB, INDIO, CALIFORNIA, THAT REQUIRE CONSIDERATION IN THIS APPLICATION. THE PROPOSED SITE IS LOCATED INSIDE THE 47 DBU SERVICE CONTOUR OF KSFV-LP. THE PROPOSED OPERATION WOULD NOT RESULT IN PREDICTED INTERFERENCE TO K06MB.**

**THE ACCOMPANYING STATEMENT IS PROVIDED WITH RESPECT TO THE RELATIONSHIP OF THE PROPOSED OPERATION AND KSFV-LP.**

**Attachment 19**
**EXHIBIT 19, STATEMENT**

**Exhibit 21**  
**Description**: EXHIBIT 21

INTERNATIONAL BORDERS

THE TRANSMITTER SITE FOR THE PRESENT OPERATION OF KPCC(FM) IS LOCATED WITHIN 320 KILOMETERS OF THE U.S.-MEXICO BORDER, AND THE PRESENT OPERATION OF THE STATION IS NOTIFIED TO MEXICO AS A CLASS B STATION ON CHANNEL 207. THIS APPLICATION DOES NOT PROPOSE ANY CHANGE IN THE LOCATION OF THE KPCC(FM) TRANSMITTER SITE, OR IN THE CHANNEL OR CLASS OF THE STATION.

Attachment 21

**Exhibit 22**  
**Description**: EXHIBIT 22

COMPLIANCE WITH ENVIRONMENTAL RULES

THE ANTENNA SYSTEM FOR THE PROPOSED OPERATION OF KPCC(FM) IS AN ELECTRONICS RESEARCH MODEL LPX-3C-HW ANTENNA, WHICH IS COMPRISED OF THREE CIRCULARLY POLARIZED DIRECTIONAL RADIATING ELEMENTS MOUNTED IN A VERTICAL LINE AND SPACED ONE-HALF WAVELENGTH BETWEEN ELEMENTS. THE ANTENNA SYSTEM WILL BE SIDE-MOUNTED ON AN EXISTING REGISTERED ANTENNA TOWER.

COMPUTATIONS BASED ON EQUATION 9 OF SECTION 2 OF THE COMMISSION'S 'OET BULLETIN 65 (EDITION 97-01)(AUGUST 1997)' SHOW THAT ON A 'WORST CASE' BASIS, POWER DENSITY LEVELS RESULTING FROM THE PROPOSED OPERATION WOULD NOT EXCEED 25% OF THE MAXIMUM PERMITTED EXPOSURE LEVEL OF 0.2 MW/SQUARE CENTIMETER FOR UNCONTROLLED EXPOSURE SITUATIONS AT 89.3 MHZ AT ANY POINT 2 METERS OR LESS ABOVE GROUND IN THE VICINITY OF THE PROPOSED ANTENNA SUPPORTING TOWER. THE PROPOSED OPERATION THEREFORE IS EXCLUDED FROM CONSIDERATION WITH RESPECT TO RADIOFREQUENCY RADIATION LEVELS RESULTING FROM OPERATION OF OTHER TRANSMITTING FACILITIES AT THE MT. WILSON 'ANTENNA FARM.' ONE OR MORE RF HAZARD WARNING SIGNS ARE POSTED NEAR THE BASE OF THE ANTENNA TOWER.

THE APPLICANT WILL OPERATE THE PROPOSED TRANSMITTING FACILITIES AT REDUCED POWER, OR TEMPORARILY CEASE OPERATION, AS MAY BE REQUIRED TO PROTECT ALL WORKERS FROM EXPOSURE TO HAZARDOUS LEVELS OF RADIOFREQUENCY RADIATION.

Attachment 22
EXHIBIT 16, Contour Overlap Requirements

PART A

Overlap of Contours

Statement

The proposed operation of KPCC(FM) would conform with the requirements of Section 73.509 of the Commission’s Rules with respect to overlap of contours with the existing stations, construction permits and applications that require consideration, with the exceptions described in Part A of this Exhibit.

Figure 1 of Part A shows the contours to be considered with respect to co-channel contour overlap, for the KPCC(FM) proposed operation and KCRI(FM).

The contours to be considered with respect to first adjacent channel contour overlap are shown in Figures 2A and 2B of Part A, for the present and proposed operation of KPCC(FM), respectively, and for KCRU(FM), KUOR-FM, the pending application of KLFH(FM), and KXRD(FM). The present operation of KPCC(FM) receives a small amount of contour overlap from KUOR-FM, and this overlap area appears also for the KPCC(FM) proposed operation, as permitted under the provisions of Section 73.509(d) of the Commission’s Rules.

Figure 3 of Part A shows the contours to be considered with respect to second and third adjacent channel contour overlap for the KPCC(FM) proposed operation and KSPC(FM), KUCI(FM), KXLU(FM) and KCRW(FM). Three of these stations, KSPC(FM), KXLU(FM) and KCRW(FM), are located inside the proposed KPCC(FM) 60 dBu contour, and the proposed KPCC(FM) site is located inside the 60 dBu contour of KCRW(FM).

The transmitting facilities assumed for the FM stations included in the contour overlap studies shown in Figures 1, 2A, 2B and 3 are listed in Table A of Part A.

For the contour overlap between the stations on the second and third adjacent channels, the present operation of KPCC(FM) receives contour overlap from KSPC(FM), on Channel 204A; KXLU(FM), on Channel 205A; and KCRW(FM), on Channel 210B. The respective areas of contour overlap received from these stations, and the populations within these overlap areas, would remain unchanged for the KPCC(FM) proposed operation.
EXHIBIT 16, PART A (continued)

Overlap of Contours

The present operation of KPCC(FM) results in third adjacent channel contour overlap caused to KCRW(FM), on Channel 210B, in an area of 9.2 square kilometers. For the KPCC(FM) proposed operation, this overlap area would increase to 12.2 square kilometers, an increase of 3.0 square kilometers. Both the present and the proposed areas of contour overlap caused to KCRW(FM) are shown in Figure 4 of Part A, on a portion of the Mt. Wilson, Calif. (1995), U.S.G.S. 7-1/2-minute topographic map. The contours shown in Figure 4 were determined from calculations based on free-space propagation.

It can be seen from the topographic map that the present area of contour overlap caused to KCRW(FM) encompasses all of the Mt. Wilson Observatory area and the Mount Wilson “antenna farm.” The map shows that the additional area of contour overlap resulting from the KPCC(FM) proposed operation includes only three structures, believed to be cabins used by hikers (because there is no other access); plus a short (0.4-kilometer) segment of the paved road between State Route 2 and Mount Wilson. The additional area of contour overlap therefore may be considered unpopulated.

The 60 dBu contours for the present and proposed operation of KPCC(FM) are shown in Figure 5 of Part A. A study based on the 2000 U.S. Census shows that the present KPCC(FM) 60 dBu contour includes 10,938,536 persons in an area of 6,647 square kilometers, and that the proposed KPCC(FM) 60 dBu contour would include 11,457,910 persons in an area of 7,243 square kilometers. This represents an increase of 519,374 persons, or 4.7 percent of the population, and 596 square kilometers, or 9.0 percent of the area, over the present 60 dBu contour.

The applicant requests a waiver of the requirements of Section 73.509 of the Commission’s Rules for the proposed operation of KPCC(FM), with respect to the additional area of contour overlap caused to KCRW(FM), and also the contour overlap received from KSPC(FM), KXLU(FM) and KCRW(FM). The applicant recognizes that the Commission may approve future modifications of any of these second and third adjacent channel stations in accordance with the Commission’s policies. Justification for the waiver request is provided in Part B of this Exhibit.
EXHIBIT 16, PART A (continued)

Overlap of Contours

For a brief historical perspective, at the time the application for the present KPCC(FM) transmitting facilities was filed in 1986, the maximum value of effective radiated power for a Class B station in the U.S.-Mexico border zone at an antenna height of 891 meters above average terrain was determined to be 600 watts, under the provisions of the 1972 U.S.-Mexico FM Broadcasting Agreement that was in effect at the time. In the 1972 FM Agreement the chart showing the F(50,50) propagation curves differed from Figure 1 of Section 73.333 of the FCC Rules, and the maximum effective radiated power was calculated using the more restrictive curves of the 1972 FM Agreement. In the 1992 U.S.-Mexico FM Broadcasting Agreement presently in effect, the chart showing the F(50,50) propagation curves is identical to Figure 1 of Section 73.333 of the Commission’s Rules, with the result that a maximum value of 860 watts effective radiated power for the KPCC(FM) Class B facilities would now be permitted.

The FM station contours shown in Part A were based on data contained in the Commission’s files, and were determined in accordance with the requirements of Section 73.313 of the Commission’s Rules, from computerized calculations based on the NGDC 30-second terrain database and Figures 1 and 1a of Section 73.333 of the Rules. Distances to the contours were calculated at azimuthal increments of five degrees.

Populations shown in Part A were determined by computerized calculations using block level data from the 2000 U.S. Census. Areas shown in Part A were determined with a compensating polar planimeter and computation.

Fred W. Volken
Engineering Consultant

September 2007       Sierra Madre, California
## EXHIBIT 16, PART A (continued)

Overlap of Contours

### TABLE A

Broadcast Station Facilities

<table>
<thead>
<tr>
<th>Channel and Class</th>
<th>Station and Location, Status, File Number</th>
<th>Geographical Coordinates</th>
<th>Facilities</th>
<th>Antenna Height Above Average Terrain (meters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>207B</td>
<td>Proposed KPCC(FM), Pasadena, CA</td>
<td>N 34° 13’ 36” W118° 03’ 58”</td>
<td>0.86 kW Directional</td>
<td>891</td>
</tr>
<tr>
<td>207B</td>
<td>KPCC(FM), Pasadena, CA License BMLED-20011128ACS</td>
<td>N 34° 13’ 36” W118° 03’ 58”</td>
<td>0.6 kW Nondirectional</td>
<td>891</td>
</tr>
<tr>
<td>207B</td>
<td>KCRI((FM), Indio CA License BLED-19980527KC</td>
<td>N 33° 48’ 07” W116° 13’ 28”</td>
<td>3.3 kW Nondirectional</td>
<td>171</td>
</tr>
<tr>
<td>206A</td>
<td>KCRU(FM), Oxnard, CA License BLED-20040422ABU</td>
<td>N 33° 06’ 47” W119° 03’ 34”</td>
<td>0.85 kW Directional</td>
<td>260</td>
</tr>
<tr>
<td>206A</td>
<td>KUOR-FM, Redlands, CA License BLED-19890501KA</td>
<td>N 34° 11’ 47” W117° 02’ 56”</td>
<td>0.035 kW Nondirectional</td>
<td>848</td>
</tr>
<tr>
<td>208B1</td>
<td>KLFH(FM), Ojai, CA Application BPED-20060413ABX</td>
<td>N 34° 24’ 45” W119° 11’ 16”</td>
<td>1.0 kW Directional</td>
<td>403</td>
</tr>
<tr>
<td>208B1</td>
<td>KXRD(FM), Victorville, CA License BLED-19950706KC</td>
<td>N 34° 36’ 44” W117° 17’ 27”</td>
<td>1.25 kW Directional</td>
<td>430</td>
</tr>
<tr>
<td>Channel and Class</td>
<td>Station and Location, Status, File Number</td>
<td>Geographical Coordinates</td>
<td>Facilities</td>
<td>Antenna Height Above Average Terrain (meters)</td>
</tr>
<tr>
<td>------------------</td>
<td>------------------------------------------</td>
<td>--------------------------</td>
<td>------------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>204A</td>
<td>KSPC(FM), Claremont, CA License BLED-1190</td>
<td>N 34° 05’ 38” W 117° 42’ 35”</td>
<td>3.0 kW Nondirectional</td>
<td>-81</td>
</tr>
<tr>
<td>205A</td>
<td>KUCI(FM), Irvine, CA License BLED-19930305KA</td>
<td>N 33° 38’ 41” W 117° 50’ 36”</td>
<td>0.2 kW Directional</td>
<td>-3</td>
</tr>
<tr>
<td>205A</td>
<td>KXLU(FM), Los Angeles, CA License BLED-662</td>
<td>N 33° 58’ 16” W 118° 24’ 56”</td>
<td>2.9 kW Nondirectional</td>
<td>3</td>
</tr>
<tr>
<td>210B</td>
<td>KCRW(FM), Santa Monica, CA License BLED-19810325AF</td>
<td>N 34° 07’ 08” W 118° 23’ 30”</td>
<td>6.9 kW Nondirectional</td>
<td>338</td>
</tr>
</tbody>
</table>

Second and Third Adjacent Channel Stations
EXHIBIT 16, PART A
(continued)
Overlap of Contours

FIGURE 2A
First Adjacent Channel Interference Considerations

Reference grid spacing - 30 min.
EXHIBIT 16, PART A
(continued)
Overlap of Contours

FIGURE 2B
First Adjacent Channel Interference Considerations

KXRD(FM) 60 dBu F(50,50)

KXRD(FM) 54 dB F(50,10)

+ KXRD(FM) 208B1

KLFH(FM) APPL. 60 dBu F(50,50)

KLFH(FM) APPL. 54 dBu F(50,10)

KCRU(FM) 60 dBu F(50,50)

KCRU(FM) 54 dBu F(50,10)

PROPOSED KPCC(FM) 207B

KPCC(FM) LIC. 54 dBu F(50,10)

KPCC(FM) LIC. 60 dBu F(50,50)

KUOR-FM 60 dBu F(50,50)

KUOR-FM 54 dBu F(50,10)

Reference grid spacing - 30 min.

N33°30'00.00" W119°00'00.00"

PACIFIC OCEAN

KILOMETERS

-25  0  25
EXHIBIT 16, PART A (continued)
Overlap of Contours

FIGURE 3
Second and Third Adjacent Channel Interference Considerations

KCRW(FM) 100 dBu F(50,10)
KCRW(FM) 210B
KSPC(FM) 204A
KSPC(FM) 100 dBu F(50,10)

KCRW(FM) 60 dBu F(50,50)

KXLU(FM) 60 dBu F(50,50)
KXLU(FM) 100 dBu F(50,10)

KUCI(FM) 100 dBu F(50,10)
KUCI(FM) 205A
KUCI(FM) 60 dBu F(50,50)

Reference grid spacing - 15 min.
EXHIBIT 16, PART A
(continued)
Overlap of Contours

FIGURE 4
Third Adjacent Channel Interference Considerations

Reference grid spacing - 1 min.

METERS
-500
0
500
PART B

Request for Waiver of Section 73.509 of Commission’s Rules

In *Educational Information Corporation*, 6 FCC Rcd. 2207 (1991), the Commission recognized that second – and third – adjacent channel overlaps result in the replacement of signals in small areas around the transmitter site of the interfering station and therefore have less adverse effects than co – or adjacent – channel overlap, which result in loss of service.

The Commission has long recognized that the unique characteristics of the noncommercial service and the need for flexibility to respond to the growing demand for such service. We are also more sensitive today to the increasing limitations within the reserved band which reflect the increased demand for service over the past 30 years. For these reasons, we are now inclined to grant waivers of second or third adjacent channel overlap in circumstances such as WCPE’s, where the benefit of increased noncommercial service so heavily outweighs the potential for interference in very small areas. However, because of the concern for the ability of the stations causing interference to make any further changes in their own facilities, as discussed below, we believe that the waiver of interference received must be granted with the acknowledgement that future modifications proposed by the affected licensees will not be construed as a *per se* modification of the waiver recipient’s license.

6 FCC Rcd. at 2208.

The instant waiver request is similar to the request that was granted in *Educational Information Corporation*. The proposed upgrade will increase the coverage of KPCC by 519,374 persons, or 4.7% of the population currently served, and by an area of 596 square kilometers, or 9.0% of the area currently served by KPCC. The benefit of increased service would heavily outweigh the potential for interference. The overlap area consists of an area of 12.2 square...
EXHIBIT 16, PART B (continued)

Request for Waiver of Section 73.509 of Commission’s Rules

kilometers, and would increase the existing overlap area by only 3 square kilometers. There is no residential population in the new area of overlap.

Because the new overlap area is unpopulated, the affected third-adjacent channel station, KCRW, will not be adversely affected. The applicant would, however, consent to a condition recognizing that a modification of KCRW’s license would not be a per se modification of the license of KPCC.

John Crigler
Attorney for Pasadena Area Community College District

Garvey Schubert Barer
EXHIBIT 19, Television Channel 6 Protection

Statement

Venture Technologies Group, LLC (“VTG”), the licensee of KSFV-LP, San Fernando Valley, California holds a permit to relocate station operations from channel 26 to channel 6 and for Class A eligibility. Pasadena Area Community College District and other noncommercial stations have sought review of that grant and have opposed the grant of the KSFV-LP license, based upon the adverse effects that such a grant would have upon NCE stations in the Los Angeles area, and, in particular, upon the preclusive effect such a grant would have on the ability of NCE stations to improve noncommercial FM service through minor modifications of technical facilities. VTG maintains that such concerns are purely speculative.

The instant application puts that argument to rest. The Commission must either condition the grant of the pending KSFV-LP license application (BPTVL-20041008ACU) to require that KSFV-LP receive the interference that would result from a grant of the instant application, or deny the pending KSFV-LP license application and rescind the underlying request for Class A eligibility.

John Crigler
Attorney for Pasadena Area Community College District

Garvey Schubert Barer